

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a Delaware
corporation,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC., a Delaware
corporation, and FAIRCHILD
SEMICONDUCTOR CORPORATION,
a Delaware corporation,

Defendants.

C.A. No. 04-1371

**DECLARATION OF PAUL HOROWITZ IN SUPPORT OF
DEFENDANTS' ANSWERING CLAIM CONSTRUCTION BRIEF**

I, Paul Horowitz, the undersigned, declare as follows:

1) I am a Professor of Physics and of Electrical Engineering at Harvard University, where I teach courses in Physics and in Electronics, and where I perform and supervise experimental research. I have been asked to give expert opinions and testimony concerning Power Integrations' U.S. Patent Nos. 6,107,851, 6,229,366, and 6,249,876 (the "'851 Patent", "'366 Patent", and "'876 Patent", respectively.

2) I agree with Mr. Blauschild's statement in ¶ 6 of his declaration that "from a technical standpoint,... one of skill in the art could conceive of various 'soft start circuit' structures to accomplish the functions recited in the patent claims associated with the soft start circuit...." However, the use of the term "soft start" in the elements of the claims of the '366 and '851 Patents goes beyond a mere functional statement by requiring a circuit to carry out soft start and, more specifically, that the claimed circuit must operate in a certain way – namely, by generating a signal that blocks the drive signal

generated by the drive circuit during at least a portion of the time that it would otherwise have been asserted.

3) Were the Court to construe the “soft start circuit” elements of the ‘366 Patent as means-plus-function limitations, one structure described in the specification of the ‘366 Patent that would perform the claimed function is soft start capacitor 110 illustrated in Figure 1 of that patent.

4) I disagree with Mr. Blauschild’s statements in Paragraph 7 of his declaration concerning the construction of the term “frequency variation signal”, recited in Claims 1 and 11 of the ‘851 Patent and Claims 5 and 14 of the ‘366 Patent. Neither the claims nor the patents’ specifications require that the “frequency variation signal” be an internal signal that cyclically varies in magnitude during a fixed period of time. To the contrary, based on the patents’ claims, specifications, and prosecution histories, one of ordinary skill in the art would understand “frequency variation signal” to be a signal used to vary the frequency of the oscillation signal.

I declare the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Executed on January 17, 2006 in Cambridge, Massachusetts.


Paul Horowitz

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of January, 2006, the attached **DECLARATION OF PAUL HOROWITZ IN SUPPORT OF DEFENDANTS' ANSWERING CLAIM CONSTRUCTION BRIEF** was served upon the below-named counsel of record at the address and in the manner indicated:

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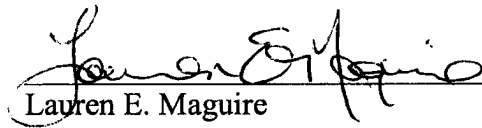
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